

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NATASHA SEVERIN, *et al.*,

Plaintiffs,

No. 10 Civ. 9696 (DLC)

v.

DECLARATION

PROJECT OHR, *et al.*,

Defendants.

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I, Natasha Severin, pursuant to 29 U.S.C. Section 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I was employed as a home attendant by Defendant Project OHR from January 2005 through December 2010.
2. During that time, I provided services to a number of Project OHR's clients. I performed "personal care services" and "household services" for clients. The "personal care services" I provided included, but were not limited to, assistance with meal preparation, keeping special diets, (N.S.) bathing, dressing, feeding, personal grooming, toileting, medications, escorting clients, I provided them with moral and emotional support. (N.S.) and going on errands. I also performed "household work" for clients, including but not limited to sweeping and mopping floors; cleaning bathtubs, basins and toilets; cleaning refrigerators; cleaning and organizing storage cabinets; dusting; washing windows and blinds; removing garbage; and laundering by hand and machine.

3. Many of my clients had no other support except that which I provided. In these cases, I and other home attendants were the only ones doing any kind of household

work. If I arrived at a client's residence and found a mess, or dangerous or unhygienic conditions, I knew it was my responsibility to clean up, and I did.

4. Throughout my employment by Project OHR, it was my understanding that I was expected to perform household work, including cleaning, for my clients.

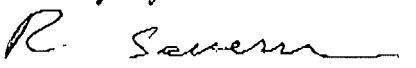
5. Project OHR told home attendants that we were not supposed to do "heavy cleaning." I (and other home attendants) did it anyway because my clients insisted on it and I was afraid that I would be taken off the case if I refused, which would mean that I would be without work.

6. I was not aware of any limits on the number of hours I was allowed to spend performing household work. No one told me to keep track of the amount of time I spent performing different tasks, and I never did.

7. To my knowledge, Project OHR did not have any way to monitor how much time I spent performing household work for my clients. I did report the tasks that I performed, including cleaning, on the Santrax system, but there was no way for me to record or report how much time I spent doing different tasks.

8. Sometimes, nurses would visit the residences of my clients to do "supervisory visits." The nurses would not stay for very long, and they generally did not observe me performing my job duties.

9. I often worked 24 hour shifts for my clients. When I did, it was not uncommon for me to spend 4 hours or more performing household work such as sweeping, mopping, dusting, vacuuming, cleaning bathrooms and other kinds of cleaning. It was not uncommon for me to perform tasks like this every day.



Natasha Severin